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9 **SUPERIOR COURT OF CALIFORNIA**
10 **COUNTY OF ORANGE, CENTAL JUSTICE CENTER**

11 PEOPLE OF THE STATE OF CALIFORNIA,

12 *Plaintiff,*

13 v.

14 LYNN DEAN JOHNSON,

15 *Defendant.*

) Case No.: M-17196

) DECLARATION OF ATTORNEY
SCOTT SANDERS

16 **DECLARATION OF COUNSEL**

17 I, Scott Sanders, declare:

18 1. That I am an Assistant Public Defender for the County of Orange and represent
19 the defendant in the above-entitled action;

20 2. I represent Lynn Dean Johnson in the habeas corpus proceedings, and
21 previously represented him at trial.

22 3. On January 24, 2010, I conducted a telephone interview with Paul Haynes. My
23 investigator was present. I explained that I was representing Mr. Johnson. Below are some
24 of the subject matters we discussed.

25 4. I asked Mr. Haynes about his involvement in the book, *I'll Be Gone in the*
26 *Dark*, including specific questions about approximately 37 boxes and 2 bins of materials that
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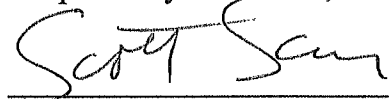
1 were obtained from the Orange County Sheriff's Department in January of 2016, according
2 to the book.

3 5. Mr. Haynes was unwilling to tell me the name of the investigator who
4 facilitated the process of removing materials from the OCSD so they could be transported to
5 the home of Michelle McNamara. He said that he took possession of items after
6 McNamara's death and returned them to the investigator at the end of 2016.

7 6. Mr. Haynes said the 37 boxes consisted of an aggregate of materials from
8 throughout the state related to the Golden State Killer investigation, which he referred to as
9 the Original Night Stalker/East Area Rapist investigation. He said that other jurisdictions
10 maintained materials, as well. He indicated there were other unsolved case files from Orange
11 County within the materials they received. He stated a few case names, but he could not
12 remember others. He said that "Johnson" sounded familiar, though I did not ask him whether
13 there was any materials related to Johnson's case within the boxes.

14 I declare under penalty of perjury that the foregoing is true and correct, except as to
15 those matters are based upon information and belief and as to those matters I believe them
16 to be true. Executed on the 25th day of June, 2020, at Westminster California.

17 Respectfully submitted,

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20 Scott Sanders
21 Assistant Public Defender
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